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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

RITA MARIE SALLISON, individually and as  
Personal Representative of the Estate of  
Kyilea Renee Swazer,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

Case No. \_\_\_\_\_

**COMPLAINT FOR PERSONAL INJURIES AND  
WRONGFUL DEATH/MEDICAL MALPRACTICE**

Plaintiff alleges:

1. Rita Marie Sallison is the Personal Representative of the Estate of Kyilea Renee Swazer and brings this action on behalf of herself and as personal representative of her daughter's Estate. She is a resident of Anchorage, Alaska.

2. Both Ms. Sallison and Ms. Swazer received medical care at the Alaska Native Medical Center in Anchorage Alaska.

3. This Court has jurisdiction pursuant to 28 USC § 1346(b) and 28 USC §§ 2671, et. seq.

4. Ms. Sallison was the mother of Kyilea Renee Swazer.

5. On April 11, 2014, Ms. Sallison was pregnant and presented at the Alaska Native Medical Center ("ANMC") with symptoms consistent with the beginning of labor. Ms. Sallison had

a previous cesarian section and was at increased risk of uterine rupture. Her medical records at ANMC confirmed this and those treating her were aware of this fact.

6. A pregnant patient with a history of a C-section is at increased risk of uterine rupture.

7. While in labor she experienced severe pain, unrelated to contractions. She was given misoprostol. She was not closely monitored. There was an extended period of time from when the membranes were ruptured and a C-section was performed.

8. When a C-section was performed, it was found that her uterus had ruptured and the baby's head was outside the uterus.

9. The delay in performing the C-section, the failure to monitor Ms. Sallison closely and the administration of misoprostol all fell below the standard of care and was negligent.

10. As a result of the negligence of ANMC, Kyilea Swazer suffered severe neuropathy and survived only a few days and Ms. Sallison is unable to bear children. Both experienced pain and suffering and emotional distress, as did Ms. Swazer's father. The Estate experienced economic loss.

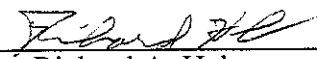
11. Standard Forms 95 were submitted by both Ms. Sallison and the Estate.

12. On February 9, 2017, the claims presented by both forms were denied by the Department of Health & Human Services.

WHEREFORE, plaintiff on her own behalf and as personal representative asks that she be given judgment against the United States of America for damages in the amount of \$1,350,000.00 and such other relief as the Court may deem just.

DATED at Anchorage, Alaska this 12 day of March, 2017.

BOOKMAN & HELM, LLP  
Attorneys for Plaintiff, Rita Sallison, individually and  
on behalf of the Estate of Kyilea Renee Swazer

By:   
Richard A. Helm  
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